

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

RASUL ROE, et al.,

Plaintiffs,

V.

ALEJANDRO MAYORKAS, *et al.*,

Defendants.

Civil Action No. 22-cv-10808-ABD

DECLARATION OF JESSICA K. LEIGH

I, Jessica K. Leigh, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I am the Director of Parole Operations within the International and Refugee Affairs Division (“IRAD”) within the Refugee, Asylum and International Operations (“RAIO”) Directorate within U.S. Citizenship and Immigration Services (“USCIS”), a component agency within the Department of Homeland Security (“DHS”). I am familiar with the applications for parole filed on behalf of Plaintiffs known pseudonymously as Marwa Moe, Malia Moe and Medina Moe by Plaintiff Malik Moe. The statements contained in this declaration are based upon my personal knowledge and review of relevant documents, upon information provided to me in my official capacity, and conversations with my staff.
2. On September 24, 2021, Plaintiff known pseudonymously as Malik Moe filed Forms I-131, Application for Travel Document, requesting parole on behalf of Plaintiffs Marwa Moe, Malia Moe and Medina Moe, who are all Afghan nationals.
3. On November 10, 2022, USCIS issued a Request for Evidence (“RFE”) to Malik Moe in connection with the Form I-131s submitted on behalf of Malia Moe. On November

15, 2022, USCIS issued RFEs in connection with the Form I-131s submitted on behalf of Marwa and Medina Moe.

4. On February 23, 2023, Malik Moe responded to the RFE seeking information concerning Malia Moe. On February 28, 2023, Malik Moe responded to the RFEs for Marwa and Medina Moe.
5. On or about May 16, 2023, USCIS' Parole Operations¹ issued Notices of Continued Parole Processing on behalf of Marwa Moe, Malia Moe and Medina Moe, informing Plaintiff Malik Moe that the cases were eligible for further parole processing, but that USCIS is unable to complete processing of the parole requests for beneficiaries in locations without consular services. Therefore, for USCIS to be able to continue processing the parole requests, he must notify USCIS when the parole beneficiaries are in a location with a U.S. embassy or consulate.
6. As of the date of this declaration, USCIS' Parole Operations has not been notified that Plaintiffs Marwa Moe, Malia Moe and Medina Moe have relocated to a location with a U.S. embassy or consulate. Additionally, USCIS' Parole Operations has no record that Plaintiffs contacted USCIS regarding assistance with the Moes' relocation to a location with a U.S. embassy or consulate.

Executed at ___Silver Spring, MD___ on this ___20th___ day of ___December___, 2024.

**JESSICA K
LEIGH**

Digitally signed by
JESSICA K LEIGH
Date: 2024.12.20
16:14:47 -05'00'

Jessica K. Leigh
Director of Parole Operations
U.S. Citizenship and Immigration Services
U.S. Department of Homeland Security

¹ Then known as the RAIO Humanitarian Affairs Branch.